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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13
14 ROBERT ROSS, Plaintiff,
15 v.
16 AT&T MOBILITY LLC, ONE TOUCH
DIRECT, LLC, and ONE TOUCH DIRECT-
SAN ANTONIO LLC, Defendants.
17

CASE NO. 4:19-CV-06669 (JST)

**JOHNSON DECLARATION ISO JOINT
STIPULATION TO REQUEST ORDER
EXTENDING SCHEDULING ORDER
DEADLINES**

Fact discovery cutoff – April 8, 2022
Expert disclosures – April 22, 2022
Expert rebuttal – May 27, 2022
Dispositive motions – July 15, 2022
Pretrial conference statement – October 28, 2022
Pretrial conference – November 4, 2022
Trial – December 5, 2022

1 I, Ashley E. Johnson, declare and state as follows:

2 1. This Court issued an initial Scheduling Order on March 19, 2020 (Dkt. 42).
3 2. After One Touch Direct, LLC and OneTouch Direct – San Antonio LLC were added as
4 Defendants, and upon request of the parties in a joint case management statement, this Court issued a
5 Revised Scheduling Order (Dkt. 95) on April 21, 2021 setting the following case deadlines:
6

7 Fact discovery cutoff – December 23, 2021
8 Expert disclosures – January 6, 2022
9 Expert rebuttal – February 10, 2022
10 Dispositive motions – March 1, 2022
11 Pretrial conference statement – July 15, 2022
12 Pretrial conference – July 22, 2022
13 Trial – August 15, 2022

14 3. On August 26, 2021, Magistrate Judge Ryu entered a discovery order in this action (Dkt.
15 118).

16 4. The Parties have conferred and agreed to postpone the settlement conference previously
17 scheduled for September 30, 2021 to November 2021, because Plaintiff's counsel has indicated that he
18 believes the settlement conference would be more productive if he is allowed additional time to confer
19 with his client regarding Magistrate Judge Ryu's order, as well as ongoing developments in other cases;

20 5. The Parties have further agree that the current scheduling order should be extended as
21 follows in light of the postponement to the settlement conference and to preserve the resources of the
22 Parties and the Court:

23 Fact discovery cutoff – April 8, 2022
24 Expert disclosures – April 22, 2022
25 Expert rebuttal – May 27, 2022
26 Dispositive motions – July 15, 2022
27 Pretrial conference statement – October 28, 2022
28 Pretrial conference – November 4, 2022
29 Trial – December 5, 2022

30 6. The parties have previously extended the schedule entered by the Court on one occasion
31 (Dkt. 42).

7. The stipulation will not affect any deadlines fixed by the Court other than as set forth herein.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 29, 2021 in Dallas, Texas.

By: /s/ Ashley E. Johnson
Ashley E. Johnson

Attorney for Defendant AT&T MOBILITY LLC